

# EXHIBIT R

Gregg Rhode

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

SOLOMAN OLUDAMISI AJIBADE and	)	
ADENIKE HANNAH AJIBADE, as	)	
natural parents of Mathew	)	
Ajibade, and THE ESTATE OF	)	
MATHEW AJIBADE and CHRIS	)	
OLADAPO, its Executor,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	CIVIL ACTION NO.
	)	
JOHN WILCHER, in his official	)	4:16-CV-82-WTM-GRS
capacity as Chatham County	)	
Sheriff, et al.,	)	
	)	
Defendants.	)	
	)	

DEPOSITION OF

GREGG RHODE

March 30, 2017

9:41 a.m.

Oliver Maner  
218 West State Street  
Savannah, Georgia

Annette Pacheco, RPR, RMR, CCR-B-2153

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1 Q. How long had you been in internal affairs?

2 A. I was transferred there as a sergeant in  
3 2011, I believe. And then I was promoted in 2015 to  
4 lieutenant, in December of 2015, I think. And then I  
5 took over that unit as commander in IA that December  
6 of 2015, if I'm not mistaken. And then January 20 --  
7 no. December 2014 -- I'm getting my years confused.  
8 What day did --

9 Q. The death -- he came into the jail on  
10 January 1st, 2015.

11 A. 2015. It was December 2014 --

12 Q. Okay.

13 A. -- that I took over. And then 20 --  
14 January he dies.

15 Q. Right. Died on the morning of January  
16 2nd.

17 A. Okay.

18 Q. Okay. So a month before you had become  
19 commander of the IA unit?

20 A. Correct.

21 Q. All right.

22 A. But I had worked in the unit since 2011.

23 Q. Okay. And just so I'm clear, the  
24 commander is the top executive in the IA unit?

25 A. Over that unit.

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1           Q.     Okay. Let me ask you about the Taser  
2 policies. This is a good time to get into that. The  
3 Tasers, as we understand, were pulled in May of 2015;  
4 right?

5           A.     I have no idea when they were pulled.

6           Q.     You remember that happening?

7           A.     I do recall it happening. I just don't  
8 know when.

9           Q.     Okay. Do you recall anything that was  
10 done with the Tasers after that point?

11          A.     Yes. I tasked somebody with pulling an  
12 investigator to pull in all the video off of it. If  
13 anything was suspect, we addressed it.

14          Q.     And who was that?

15          A.     That was -- I want to say it was  
16 Jeffrey Young.

17          Q.     Okay. We've heard of an officer named  
18 O'Neill Young. Is that the same person or is that  
19 someone different?

20          A.     O'Neill Young?

21          Q.     Yeah.

22          A.     I don't know who that is.

23          Q.     Okay. All right. So Mr. Young. So  
24 Mr. Young, as I understand it, went through and  
25 watched every video that was available, that was

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1     you look at it. But to go headhunt and dig up and  
2     try to compile information just to do it, that should  
3     have been done by others. That's -- and then when  
4     they find it, they give it to us.

5           Q.     Right.

6           A.     That's how it works.

7           Q.     So our record's clear, you're saying that  
8     supervisors should have been responsible to see what  
9     deputies were doing. And if they had a problem, they  
10    should have referred it to you for --

11          A.     That's what supervisors do.

12          Q.     Right.

13          A.     And if it's not done that way, then we  
14    don't have anything to act on.

15          Q.     So as I understand it, after coming out of  
16    this review of every Taser that you could get your  
17    hands on, and having Mr. Young watch every video that  
18    he could find --

19          A.     Uh-huh.

20          Q.     -- I know at least one investigation that  
21    involves Sergeant Moultrie. I'm curious if you can  
22    tell me are there other investigations that were  
23    spawned as a result of watching these videos that you  
24    can remember?

25          A.     There were.

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1 Q. Can you tell me who they were?

2 A. No. I cannot -- names, I cannot remember.

3 Q. Okay. Can you give me situations or, you  
4 know --

5 A. Okay. Let me say this. There was  
6 investigation that -- I do recall one -- I don't  
7 recall the officer's name -- that he was using the  
8 Taser on his son or to threaten his son. And we  
9 discovered that. We're like what is this? And he  
10 had it at home. And he didn't do his homework or  
11 something and he was clicking -- like what?

12 Okay. Well, that came from it. So we  
13 investigated that. Hey, you can't do this. It's a  
14 department-issued Taser. No. That's inappropriate.  
15 So he was counseled on that. So that was an  
16 investigation, so to speak. Not much of one --

17 Q. Right.

18 A. -- but an investigation nonetheless.

19 And so there were others that were looked  
20 at. There were -- there was another one that it  
21 looked egregious on its face, but then we read  
22 reports and so forth before and after and so forth  
23 and discovered it was not excessive. Or that was --  
24 it did not appear to be excessive. Here's the  
25 report.

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1                   So we did do investigations. How many and  
2 names, I cannot recall.

3           Q.       Would all those have been catalogued in a  
4 certain place?

5           A.       Catalogued?

6           Q.       Let me put it to you this way. Was there  
7 a cover letter, a memo or a report to your boss that  
8 said, hey, Rusty, here's a list of everything that  
9 came out of the department-wide Taser review. We're  
10 done with the review. Here are 11 investigations we  
11 opened. Signed me.

12                   Was there anything tidy that wrapped it up  
13 like that?

14          A.       I can't recall.

15          Q.       Okay.

16          A.       I can't recall.

17          Q.       If that didn't happen, would this stuff be  
18 in IA Pro?

19          A.       Absolutely in IA Pro. Everything's in IA  
20 Pro. Everything we did was in IA Pro. Everything.

21          Q.       Okay.

22          A.       From background -- everything is in there.

23          Q.       The incident that you said looked  
24 egregious but wasn't, can you recall more details  
25 about who was involved and what the circumstances